



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLUTION PREVENTION

May 1, 2013

I, <u>Linda Hollis</u>, Biochemical Pesticides Branch, Biopesticides & Pollution Prevention Division, Office of Pesticide Programs, Office of Chemical Safety and Polution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Lebanon) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Valent Biosciences Corporation 870 Technology Way Libertyville, IL 600486316

EPA Registration Number:

73049-460

Name of Product:

S-ABSCISIC ACID, TECHNICAL GRADE ACTIVE INGREDIENT

Risk Manager 91

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division

(7511P)





April 29, 2013

Linda Hollis
Biopesticides & Pollution Prevention Division
Document Processing Desk (CERT)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
703-308-8733

RE: Gold Seal Certificate Request for S-Abscisic Acid Technical Grade Active Ingredient (EPA Reg. No. 73049-460)

Dear Ms. Hollis:

Valent BioSciences Corporation (VBC) is submitting the present request for five (5) copies of Gold Seal Certificate for S-Abscisic Acid Technical Grade Active Ingredient (EPA Reg. No. 73049-460) in Lebanon. The Gold Seal Certificates will be used to support five separate product registrations in Lebanon.

Present submission consists of:

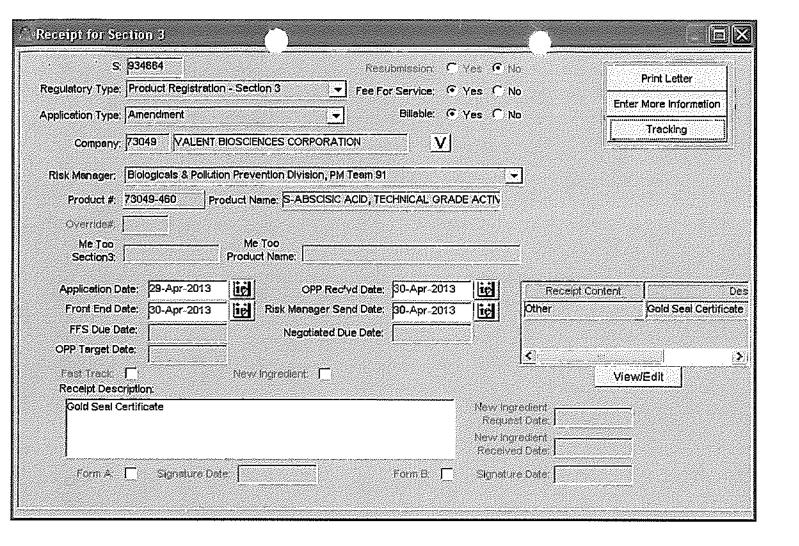
- Application for Registration (EPA form 8570-1)
- · Copy of payment confirmation made to Pay.gov in the amount of \$250
- Copy of the latest EPA stamped approved label.

Please contact me if you have any questions at 847-968-4771 or by e-mail at jayne.walz@valentbiosciences.com

Sincerely,

Jayne Walz

Regulatory Manager



'Please read Instructions on	reverse before completing form.			Form Approved,	OMB No. 20	70-0080	Print Form
United States Environmental Protectio Washington, DC 204			negistration			OPP Identifier Number	
	Applicat	ion for I	esticid	e - Section	Ī		
1. Cempeny/Product Number 73049-460	or .		2. EPA Pr L. Hollis	oduct Managor		1—	posed Classification
4. Compony/Product (Nome S-Abscisic Acid Technic) al Grade Active Ingredient		PM# X None Restricte				
5. Name and Address of Ap Valent BioSciences Corp B70 Technology Way Libertyville, IL 60048		6. Expedited Review. In accordance with FiFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name					
<u> </u>		Sec	tion - II				
Amendment - Explei	ponse to Agency latter dated		- 🗒	Finel printed lahe Agency letter dot "Me Too" Applic Other - Explein b	tod ation.	to	
Explanation: Use additional pages of recessary. (For section 1 and Section 11.) This is a request for five (S) Gold Seal Certificates for S-Abscisic Acid Technical Grade Active Ingredient for use in the registration process in Lebanon. All five of the GS will go to support individual end-use product registrations in Lebanon.							
		Sec	tion - II				
1, Motoriol This Product W	iii Be Packaged In:						
Child-Resistent Packaging You* No Certification must be submitted	Unit Packaging Yes No No No. per Unit Packaging wgt.	Water	Yes Motel Plactic Gieso Peper Gother Spocify			pocify	
3. Location of Not Contant	Information 4. Size(s) I	Rotail Conta	ner	5. L	On Lebel		na ponying product
6. Manner in Which Label	Affixed to Product Lith Per Sto	segraph ser gived neiled		Other			
Section - IV							
1. Contact Point (Comple	e Items directly below for identifica	uion of indiv	idual to be	confected, if ne	cessary, To pr		2 5 5 7
Jayne Walz			Title Tolophon Regulatory Manager 847-968				• No∌(เก็ร!ude Area Codal -4771 c
i certify that the sto i aaknowledga that beth undar applicab	ication and all ottoc stetoment m	unants the	reto aro trua, ac shabia by fino or	cultate and cor	ubjete.	8. Date Application Received ({Steinped)	
2. Signature	2. Signaturo			i. Title Regulatory Manager			
4. Typed Name Jayne Walz	_	5. Oate April 2	9, 2013				

Commercial/financial information may be entitled to confidential treatment

Walz, Jayne

From: paygovadmin@mail.doc.twai.gov Sent: Monday, April 29, 2013 9:29 AM

To: Walz, Jayne

Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you chose the option to receive payment reminders in your user profile and this is a deferred or recurring payment, you will receive a reminder email several days before the payment is processed. You may change your payment reminder preferences and email address in your user profile at any time.

If you wish to cancel this recurring payment series, log in to your account at https://www.pay.gov/ and click on the "Pending Payments List" option or contact Pay.gov Customer Service at (800) 624-1373.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 25AHMT70 Agency Tracking ID: 74442306785

Account Holder Name: Valent BioSciences Corporation Transaction Type: ACH Debit Transaction Amount: \$250.00 Payment Date:

Apr 30, 2013 Account Type: Business Checking Routing Number:

Transaction Date: Apr 29, 2013 10:29:J4 AM Total Payments Scheduled: 1

Frequency: OneTime

Decision Number: Registration Number:

Company Name: Valent BioSciences Corpor

Company Number: 73049

Action Code:

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

April 30, 2013

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-478135

EPA File Symbol or Registration Number: 73049-460

Product Name: S-ABSCISIC ACID, TECHNICAL GRADE ACTIVE INGREDIENT

EPA Receipt Date: 30-Apr-2013 EPA Company Number: 73049

Company Name: VALENT BIOSCIENCES CORPORATION

JAYNE WALZ VALENT BIOSCIENCES CORPORATION 870 TECHNOLOGY WAY LIBERTYVILLE, IL 60048-6316

SUBJECT: Receipt of Request for Gold Seal Certification Letter(s)

Dear Registrant:

The Office of Pesticide Programs has received your request for Gold Seal Certification letter(s) that is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The action has been identified as action code M006:

UP TO 5 GOLD SEAL CERTIFICATION LETTERS PER REGISTRATION

No additional payment is due at this time. If you have any questions, please contact Betty Williams at (703) 308-0132.

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Thomas Bade, Ph.D. Valent BioSciences Corporation 870 Technology Way Libertyville, IL 60048

JUN 2 0 2012

Subject:

Valent BioSciences Corporation; S-Abscisic Acid, Technical Grade Active Ingredient,

EPA Registration No. 73049-460

Application with Data to Amend the Manufacturing Process, Label and CSF; B680

D# 462249, Application Dated 3/30/12, PRIA Date 7/30/12

Dear Dr. Bade:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

- I. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 2. Submit two (2) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silkscreened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(b). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions contact Chris Pfeifer at 703-308-0031 or by email at: pfeifer.chris@epa.gov. A stamped copy of the label is enclosed for your records.

Sincerely,

Linda A. Hollis, Chief

Biochemical Pesticides Branch

Biopesticides and Pollution

Prevention Division (751IP)

Enclosure

CONCURRENCES							
SYMBOL ▶ 7511P							
SURNAME PEFER							
DATE 6/20/12							
EPA Form 1320-1A (1/90)	Printed on Recycled Paper	OFFICIAL FILE COPY					

S-Abscisic Acid, Technical Grade Active Ingredient (S-ABA, VBC-30054)

FOR FORMULATION INTO PLANT GROWTH REGULATOR (PGR) PRODUCTS

FOR MANUFACTURING OR FORMULATION USE ONLY

Active Ingredient	
S-Abscisic Acid	97.9% w/w
Other Ingredients	2.1% w/w
Total	100.0% w/w

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID				
If in Eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. 				
HOT LINE NUMBER					

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call toll-free 1-800-892-0099 (24 hours) for emergency medical treatment and/or transport emergency information. For all other information, call 1-847-968-4700.

EPA Registration No. 73049-460 EPA Establishment No. 81887-CHN-002

Valent BioSciences Corporation 870 Technology Way Libertyville, 1L 60048 1-847-968-4700

Net Content: 25 kg, 50 kg

ACCEPTED

JUN 2 0 2012

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 73049 - 460

Page 1 of 3

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Mixers, loaders and handlers must wear the appropriate personal protective equipment (PPE): long sleeved shirt and pants, shoes and sock, and protective eyewear. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination Systems (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment wash-waters or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

S-Abscisic Acid is intended for use in the formulation of Plant Growth Regulator (PGR) products, to be applied to field and container-grown plants to induce and regulate PGR responses.

This product may be used to formulate products for any additional uses not listed on the MP label if the formulator has complied with U.S. EPA data submission requirements regarding the support of such uses. Products made from this technical material will require registration with the U.S. Environmental Protection Agency (EPA).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

<u>Pesticide Storage:</u> Keep container tightly closed when not in use. Store product in a cool and dry place. Avoid extended storage conditions at temperatures above 25°C (77°F).

<u>Pesticide Disposal:</u> To avoid wastes, use all material in this container according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry). Do not contaminate water when disposing of equipment wash-water or rinsate. Improper disposal of unused pesticide, wash-water or rinsate is a violation of federal law.

Container Disposal: Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Completely empty drum liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Fill ¼ full with water. Shake for 10 seconds. Pour rinsate into manufacturing equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

Non-refillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Completely empty drum contents into manufacturing equipment or a mix tank by shaking and tapping sides and bottom to loosen clinging particles. Fill container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

Warranty and Disclaimer Statement:

To the fullest extent permitted by law, seller makes no warranty, express or implied, of merchantability, fitness or otherwise concerning use of this product other than as indicated on the label. User assumes all risks of use, storage or handling not in strict accordance with accompanying directions.

Valent BioSciences Corp. ©2012

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Label Review

File Symbol: <u>73049-460</u>

Date: 6/13/12

Reviewer: Chris Pfeifer

Site/Use	[Res/Ag /E	Soth] [Food	/Non-f	=ood /Both]	
Tox Categories: (W)aived [AcOral: 4 /AcDerm: 4 /AcInhl: 4 /Eyelrr: 3 /Skinlrr: 4 DermSens: N]					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Restricted Use Pesticide		***********			Ch 6
Product Name	✓				Pg 12-3
Compny Name and Info	✓				Pg 15-1
Identification Numbers	✓				Ch 14
Net Contents	✓			-	Ch 17
Ingredients Statement	4			Percentage changed.	Ch 5
Label Claims	4		-		Ch 12
Alternate Formula			1		5-12
		Precautionary S	tateme	ents	
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
KOROC	1				3-1 & 9 7-3 & 4
Signal Word	*				Ch 3 Ch 7 Ch 10
General Heading Precautionary Statements	*				Ch 7
First Aid (PRN 20001-1)	*				Ch 3 & 7
Hazards to Humans and Domestic Animals	✓			<u> </u>	Ch 3, 7-3
PPE (WPS) Engineering Controls	~				Ch 7,Pg 7-12 Pgs 10-4, 15
User Safety Requirements	*				Ch 10
User Safety Recommendations	*				Ch 10
Environmental Hazards	*				Ch 8
Physical and Chemical Hazards			1		Pg 3-4 Ch 9

Directions for USE (FIFRA Text, WPS plus Storage anu كisposal)						
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3	
Header Directions for Use	✓				10-16	
Violation of Federal Law text	√				10-26, 11-7	
WPS Text (PPE)	4				Ch 10, 7-1 7-11	
Non-WPS Text	~				7-12, Ch 10	
Storage and Disposal	✓				11-16, Ch 13	

Directions for Use (General Instructions and Information)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Instructions and Sub-Header	*				
Chemigation / Prohibition	*				PRN
REI	✓				Pg 10-20

	n ne esta esta esta esta esta esta esta est				
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Info. (non-site specific info. on uses, pests, mixing, and loading, tank mixing, etc.)	*		***************************************		
General Precautions and Restrictions	✓				
		Directions	for Use		
Directions for Application	✓				
· · · :		Warranty in	formation		
Consistency with label instructions	*				12-6
Not false or misleading	*				

[&]quot;The warranty section contains an overly broad statement concerning limitations of liability. As such, this statement may be misleading and may constitute misbranding under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). It is suggested that the existing statement be preceded by the phrase, To the extent allowable by state law, or otherwise qualified to make it clear that this warranty is not intended to be a statement of law which implies that the buyer has no legal rights to recover damages from the manufacturer if he/she suffered a loss or injury from the product and concludes that it would be futile to pursue what might in reality be a valid claim."

BPPD Label Amendment Checklist Fast Track □ and PRIA Actions B680 ☑ B73 □ &B90 □

EPA Reg. No.: 73049-460

RAL: Chris Pfeifer

Application Date: 3/30/12

00664600699		WWW.WW.	7855000000
#	Check list Item	Yes	No
1.	Application Form (EPA Form 8570-1) - signed & complete, including package type? If NO, stop! Call applicant and have them correct application and resubmit.	1	
2.	Final printed labeling received for previous action? If NO, stop! E-mail applicant and request final printed labeling (FPL).	√	
3.	Data and Data Matrix present? (EPA Form 8570-35) A Data Matrix is not required for 100% repacks that have the same label uses as the parent product, and that derive their data from the formulator; nor is it required for minor amendments, which do not rely on data. In these cases, skip to Item 5.		4
a.	Using Selective Method (including the cite-all option under the Selective Method)? If using Cite-all method only, skip to Item 4.	√	
b.	Complete Data Matrix supporting both the product registration and the proposed amendment. Minimum Data Matrix for registration includes: Product specific Acute Toxicity and Product Chemistry data, plus Efficacy data for public health pests claimed on label.	√	
c.	Adequate product specific data?	4	
đ.	Registered source used for active ingredient? If YES, skip to Item 5. If NO or if use not supported by registered source, generic data is necessary.	1	
e.	Data passed PR Notice 86-5 for formatting and MRID assignment?	1	
f.	Public copy of Data Matrix provided? (PRN 98-5)	4	
4.	Certification with Respect to Citation of Data present. (EPA Form 8570-34): See 40 CFR 152.80-98 and PR Notice 98-5. (If no data are required, a Certification with Respect to Citation of Data form isn't needed. This is often true for minor amendments.) NA NA	1	
a.	Did applicant check a Method of Support?	1	
b.	General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	٧	
c.	Is the form signed and dated?	1	
d.	Check form and Data Matrix. Are Exclusive Use data cited from other sources?		4
	If YES, is the required authorization letter included in application?		
5.	Label(s) Review Date of Label Review: 6/13/12		
a.	Label(s) in conformance with current Label Review Manual and appropriate REDS.	1	
b.	Labeling from Acute Toxicity, Product Chemistry, and Efficacy data for public health pests claimed on label.	1	
c.	Nominal concentration of active ingredient shown in ingredients statement.	√	
d.	Viability included as sub-statement of Ingredient Statement (if live microbial, i.e., cfu/gram). NA ☑		
e.	Storage and disposal instructions agree with container types listed on application form.	4	
f.	Unique Product Name for Same Company (Check OPPIN).	√	
g.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? If YES, RAL must evaluate label for compliance with 40 CFR 180.1071.		4
h.	Does label bear "National Organic Program" (PR Notice 2003-1) or OMRI claims?		√
i.	If YES, National Organic Program or OMRI claims approved by Chris Pfeifer? NA ☑		
	Labeling is acceptable. Corrections or changes are NOT necessary.	4	
j.	Comments: The only change to the label from the last label review (2/10) was achange in the percentage active ingredient.		
İnlamı	I RPPD Guidance Document - Other Items May be Required		July 200

BASIC CHECK LIST FOR CONFIDENTIAL STATEMENT OF FORMULAS (CSF)

Please note that if you have any questions at any point, especially with chemical or microbial names, consult with a chemist/ product characterization scientist. It may be helpful to make a copy of the CSF

for marking comments, questions, and needed corrections. Upon completion of this form, consult the

above scientists. And have them check over the CSF along with your comments.
EPA Reg#/ File Symbol: <u>73049-460</u> CSF(s) dated: <u>3/8/12</u> REVIEW DUE DATE: <u>6/12/12</u>
1. Compare CSF with prior CSF(s), and determine what is different. Notes: Manufacturing Process changes altered impurity percentages.
2. Examine label. Does this product have food or feed use sites? It's an MP. Yes, for the EPs.
3. Is each field filled out on CSF?
4. Is box 18 signed? ✓yes □no
5. Are addresses complete, including zipcodes in boxes 1, 2, and 11?
6. Have they enclosed a Material Safety Data Sheet (MSDS) for each new ingredient? ☑yes □no Deficiencies: NA.
7. In column 10. for each component is the chemical name, trade name and CAS No. listed? Is it clear what each component is? For any microbial ingredient, in column 10 - the description should include Colony forming units per gram (CFU/g) and cell collection identity number (E.g. ATCC 889-34.) ☑yes □no Deficiencies: NA. Everything is accounted for.
8. Using a chemical catalog, or Refs verify the CAS #, and chemical name for each component under consideration. Also Note any toxicological information disclosed in catalog. Deficiencies: NA. CAS#s are correct.
9. Determine PC codes for each component and write these in "EPA USE ONLY" column. Does each component have a PC Code? If code(s) are not found, it may be necessary to send request form to RD. ☑yes □no
10. For each inert component determine whether it is listed under 40 CFR 180.100I (910-960). And write these codes in "EPA USE ONLY" column. (Names may be confusing- consult with a chemist if

needed) If this product is for feed or food use, all inert ingredients MUST have appropriate

Deficiencies: No inerts. Impurities all clear.

clearance.

11. For each inert component that does not have 40 CFR clearance determine whether it is a list 1, 2,
3, 4(a), or 4(b) inert. Write this information in "EPA USE ONLY" column. References to consult
www.epa.gov/opprd001/inerts and FR Vol. 63, No. 121 pages 34384-34390. If any of the inert
ingredients are listed as "No longer used" in the above FR vol.63 notice, or are on list 1 or 2, this is a
problem to bring attention to chemist.
Problem inerts? NA Impurities Clear

12. If product used on food or feed, confirm active ingredient(s) has an established tolerance or exemption from food tolerance. (Consult Alphabetical listing in part 180 of 40 CFR pages 296-300, or the pesticide petition file jacket) □ yes ☑ no Deficiencies: 180.1281.

13. Do certified limits for EACH component agree with 40 CFR 158.175?

Amount in Column 13 b.	Prescribed limits	Upper Limit	Lower Limit
≤1%	N ± 10%N	N x 1.1	N x 0.9
>1% but ≤20%	N ± 5%N	N x 1.05	N x 0.95
>20%	N ± 3%N	N x 1.03	N x 0.97

N= amount in Column 13 b. = nominal concentration

Calculate upper and lower limits using table above and compare with those listed in columns 14 a. and 14 b. of submitted CSF. If they do not agree, identify difference(s): Proposed limits of nominal active accepted.

- 14. Does the sum of the numbers in column 13. a. equal total listed in box 17?

 ✓ yes □no
- 15 Does column 13. b. add up to 100%? ✓ yes □no
- 16. If Alternative Formulation box is checked in box A- Is there another CSF for a Basic Formulation on file?? □yes □no ☑NA
- 17. Other issues? No.

S-Abscisic Acid PC Code: 272000

Type of Review: Product Chemistry

DP Number: 462249 EPA Reg. No.: 73049-460



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, O.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MEMORANDUM

DATE:

06/12/2012

SUBJECT:

Science Review in Support of the Registration of S-Abscisic Acid Technical Grade Active Ingredient, Containing 97.9% S-Abscisic Acid (ABA) as its Active

Ingredient. Review of Product Chemistry Data: New 5-Batch Analysis and

Certified Limits.

Decision Number:

462249

DP Number:

400801

EPA File Symbol Number:

73049-460 Biochemical

Chemical Class: PC Code:

272000

CAS Number:

21293-29-8

Tolerance Exemptions:

None

MRID Numbers:

487654**-**01 & -02.

FROM:

Russell S. Jones, Ph.D., Senior Scientist

/s/ 06/12/2012

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division (7511P)

TO:

Chris Pfeifer, Regulatory Action Leader

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division (7511P)

ACTION REQUESTED

The registrant, Valent Biosciences Corporation (Valent), requests the addition of a new manufacturing site, using the same manufacturing process. In support of the amendment, the registrant has submitted a 5-batch analysis and certified limits.

Manufacturing process information may be entitled to confidential treatment

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S-Abscisic Acid PC Code: 272000

Type of Review: Product Chemistry

DP Number: 462249 EPA Reg. No.: 73049-460

RECOMMENDATIONS AND CONCLUSIONS

The data submitted for the Preliminary Analysis and Certification of Limits for S-Abscisic Acid Technical Grade Active Ingredient, containing 97.9% S-Abscisic Acid (ABA) as its active ingredient are ACCEPTABLE. No additional data are required to support the change in manufacturing source.

STUDY SUMMARIES

Preliminary Analysis (OCSPP 830.1700; MRID 48765401): Six individual batches of S-ABA Technical were analyzed by reversed-phase HPLC with UV detection at 262 nm (for details of method, see MRID 48765401, Confidential Appendix, Attachment 1). The method was used to quantify the amount of S-ABA in each batch and the impurities. Selected lots of the S-ABA technical were also analyzed using additional non-HPLC Methods. The percentage of S-ABA and impurities in 6 lots of S-ABA technical, as analyzed by HPLC, are provided in Table 1.



Additional analyses conducted by Gabraith Laboratories (see MRID 48765401, Confidential Appendix Table 2 &3, p. 12 & 13, respectively; and Confidential Appendix, Attachments 2 and 3) were provided showing other very minor impurities, individually <0.1% of the product by weight.

The mean percentage of S-ABA was determined to be 97.871% (range: 97.633-98.136%) with All impurities were reported to the Agency for previously submitted and reviewed analyses, although at slightly different mean percentages.

Sample chromatograms were provided for all analyses.

Classification: ACCEPTABLE, no additional data are required.

S-Abscisic Acid PC Code: 272000

Type of Review: Product Chemistry

DP Number: 462249 EPA Reg. No.: 73049-460

Cortication of Limits (OCSPP 830.1750; MRID 48765402): Certified limits proposed by the registrant are reflected in the data provided by the registrant in the preliminary analysis described above and in MRID 48765401. The current certified limits originally proposed for S-ABA technical are not being changed. The most recent 6 batch analysis demonstrates that the current values are within the originally proposed certified limits. Comparisons of the analyses conducted in 2011 and 2012 are provided in MRID 48765402 (Confidential Appendix, Table 4, p. 7); proposed certified limits are provided in MRID 48765402 (Confidential Appendix, Table 4, p. 8)

Classification: ACCEPTABLE, no additional data are required.

NO DERS WERE WRITTEN FOR THIS MEMORANDUM

cc: R. S. Jones, C. Pfeifer, BPPD Chron File, IHAD/ARS R. S. Jones, Ph.D., Sr. Scientist, FT, PY-S: 06/12/2012

BPB BPPD New Product/Non-Registered AI Source Readiness Screen

****Contains Confidential Business Information****

Date: 3/29/2012

Review Date: 3/29/2012

File Symbol No.: 73049-460

Reviewers: Gina Burnett

Comments: This is a PRIA Amendment to add a new manufacturing site but using the same manufacturing process. The applicant has submitted a 5-batch analysis manufactured at the new site and certified limits for the new site. The product is a manufacturing-use product with unregistered source of active ingredient plus impurities, no inerts. The product is used for seed production for non-food uses.

The applicant states in his memo dated March 8, 2012 that this change in manufacturing site also applies to EPA Reg Nos:

73**0**49-46**1** 7304**9**-462 73049-474

Andy – please make sure these actions are tracked/assigned. The new CSFs for these Reg Nos are included in this package.

Pass/Fail: PAS5

Hours Worked: 1.0

	Checklist Item	Yes	No	N/A	Comments
1.			<u>F</u> i	orms	
a.	8570-1: Application for Registration	Х			
b.	8570-4: C5F	X			
c.	8570-27: Formulator's Exemption			Х	
d.	8570-34: Certification with Respect to Data	Х			
e.	8570-35: Data Matrix	Х			
2.	Confidential Statemen	t of For	mula (C	SF)-rev	iew for alternate formulations too
a.	Signed and dated	Х	T		
b.	Food-use? (If no, skip to 1e.)		Х		
c.	All inerts cleared for food-use			Х	
d.	Active cleared for food-use			Х	

use	inerts cleared for nonfood- e (skip if food-use)	X			
f. Cor			ļ		
l I	nventional or antimicrobial		X		
	ives present?			<u> </u>	
	accurately reflects label	X	<u> </u>	<u> </u>	
	ive(s) + Inert(s) = 100%	X		1,,	
	S #s for all inerts			X	
j. Che ine	emical names provided for rts			X	
	its in all applicable boxes	X			
	prietary inerts? If so, is o. on file with the Agency?		Х		
	oplier information equately listed	Х			
n. Cer	tified limits correct?	Х			
rec	ertified limits are outside ommended range, planation provided?			X	
	crobial: culture collection erence			Х	
q. Mid for	crobial: strain designation a.i.			Х	
	robial: potency provided h a.i.			X	
s. Alte	ernate formulations?		Х		
act	ealternate formulations ually alternate and not a word product?			Х	
3.		ita Matr	ix-ACT	VE INC	REDIENT/MP
a. Sep	parate data matrix for the arce of Al		Х		
b. All req	product chemistry data uirements addressed ideline by guideline)	х			
	toxicology data	X			
req	uirements addressed				
(gu	ideline by g u ideline)				
req	nontarget toxicology data uirements addressed ideline by guideline)	Х			
(e.g	lects info. reported on CSF g.: identity of AI)	Х			
Note for 3	bd. above: if not addressed	in data ı	matrix,	may be	e addressed in elsewhere in submission
5.	<u>Da</u>	ta Requ	iremer	ts-Gui	deline Studies
Note: This	section is for submitted guid	delin e st	udies d	nly. S	ee below for waivers and rationales.

a.	Product chemistry: do all	X			,
	submitted studies appear to				
	satisfy the data requirements?	İ			
b.	Toxicology: do all submitted			Х	
	studies appear to satisfy the			1	
	data requirements?				
Ç.	Nontargets: do all the			Х	
	submitted studies appear to				
	satisfy the data requirements?			•	
d.	Other (residue data, special		X		
	studies, etc.)				
6.		Data	Require	ements	- Waivers
Note:	This section is for waivers only.	This do	es not a	apply to	rationale submitted to satisfy the data
requi	rements.				
a.	Are there any requests for		Х		
	waivers? Please note.				
þ.	For each applicable data			Х	
	requirement, does the waiver]			
	request have a separate]			
	scientific rationale justifying				
	why testing is not applicable?				
Ç.	Does each waiver request			Х	
	seem reasonable and justified?	:			
7.	<u>Data</u>	Require	ements	- Ratio	nal <mark>es/Literature</mark>
Note:	This section is for rationales only	y. This c	io e s no	t apply	to requests submitted to waive the data
requi	rem e nts.				
a.	Have rationales been		X		
	submitted in lieu of guideline				
	studies? Please note.				
b	Does each rationale have			Х	
	scientific literature citations				
	where applicable?			l	
c.	Are the rationale and scientific			X	
	citations organized in				
	reasonable order to facilitate				
	timely review and is each				
	guideline addressed				
	individually?				
d.	Are copies of cited scientific			Х	
	literature included in the				
	package?				
	Does the rationale appear to			Х	
e.	be reasonable and scientific?				

PRIA 2 – 21 Day Content Screen Review Worksheet (EPA/OPP Use Only) 3/23/09

21 Day Screen Start Date:	3-9-12		
Experts In-Processing Signature: _	MF HARRINGTON	Date 3-8/3-/2	Fee Paid: Yes
Division management contacted on	issues NoYes	Date	

EPA	Reg. Number: 73049 - 460 EPA Receipt Date: 3	· – ۶	-12	2				
	Items for Review			Yes	No	N/A*		
1	Application Form (EPA Form 8570-1)(link to form) signed & continuous package type	X		-				
2	Confidential Statement of Formula all boxes completed, form sidated (EPA Form 8570-4) (Link to form)	×						
2	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	yes	по					
3	Certification with Respect to Citation of Data (EPA Form 8570 form) completed and signed (N/A if 100% repack)	-34) (L	ink to	〉				
	Certificate and data matrix consistent	Certificate and data matrix consistent						
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)							
	If applicable, is there a letter of Authorization for exclusive use only. Formulator's Exemption Statement (EPA Form 8570-27) (Link to form)							
4	completed and signed (N/A if source is unregistered or applicant owns the technical)							
	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)							
5	a) Selective Method (Fee category experts use)	yes X	n o					
	b) Cite-All (Fee category experts use)							
	c) Applicant owns all data (Fee category experts use)							
6	5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)							

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X	
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)		X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)		Χ
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C. a) List study (or studies) not included with application		

Comments: Studies passed 11-3 leview. 487654.

Technical - Technical & Impurities only, no inerts to review

End use Product (Protoness) - Inerts approved for Food use under vocation (Protonest)

End use Product (Contego Prost) - Inerts approved for Non-Food use

End use Product (Massive Bio Nim) - Inerts approved for Non-Food use

Bud use Product (Massive Bio Nim) - Inerts approved for Non-Food use

3/19/17 - An e-mail was sent to the registrant regarding

a deficiency on the Certification formand inert issues

- An Inert clearance status form was sent.

- Received a corrected Certification form and a

- Received a corrected Certification form and a revised CSF with corrections.

Jacket PASSES

TU 3/21/12

* N/A - Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are strongly encouraged to verify that all inert ingredients have been approved for the application's uses even if a product is currently registered by consulting the inert Web

site [link to http://www.epa.gov/opprd001/inerts/lists.html] and if the inert is not approved, to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbrauch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to http://www.epa.gov/opprd001/inerts/tips.pdf] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
 number, providing documentation that the inert has been approved, or
 removing the unapproved inert from the CSF or replacing it with one that is
 approved for the application's uses; or
- Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
 number, providing documentation that the inert has been approved, or
 removing the unapproved inert from the CSF or replacing it with one that is
 approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
- 3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

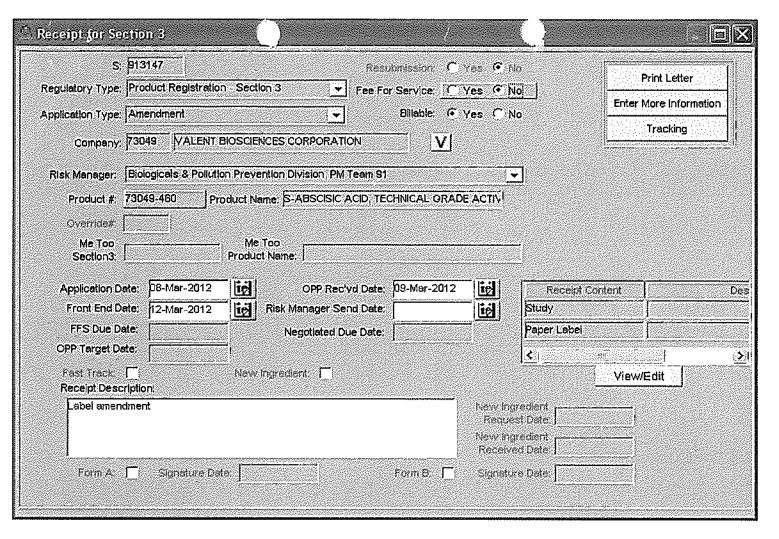
When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



Decis# 462249

FFS 5+a+ 3/30/12

PRIA due 7/30/12

Phase 1 = 4/30/12

No P20-P3

P4- 6/14/12

P5- 7/30/12

B(80

Please reed instructions on reverse before complating form.			Form Appro	oved,	OMB No. 207	0-0060	Print Form		
SEPA Environmental Protectio Washington, DC 204			<u> </u>				OPP Identifier Number		
	Application	on for F	n for Pesticide - Section I						
1. Compeny/Product Number Valent BioSciences, EPA			2. EPA Product Manager Linda Hollis 3. Preposed Clossifi						
4. Company/Product (Name Valent BioSciences / S-/) Abscisic Acid (VBC-30054)		PM# X None Restricts						
5. Name and Address of Ag Valent BioSciences Corp 870 Technology Way Libertyville IL, 60048	Đ	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name							
		Sec	tion - II						
Amendment - Explai	ponee to Agency letter dated		Final printed labels in response to Agency letter dated "Me Toe" Application. Dther - Explain below.						
Register a new site for n	Explanation: Use additional page of if necessary. (For section t and Section II.) Register a new site for manufacture, same manufacturing process, same company, new facility. Updated five lot analysis with samples manufactured at the new site.								
		Sec	tion - III						
1. Material This Product W	ill Be Packeged in:								
Child-Recistent Packaging Yes* No * Certification must tie submitted	Unit Peckeging Yes No If "Yes" No. per Unit Peckeging wgt, centainer	11 "Ye	Soluble Packaging Yes Ne Soluble Packaging Yes No No Soluble Packaging Angle Packag				pecifyl		
3. Location of Net Content	s Information 4. Size(s) R Container	etail Conta	iner	5. Lo	On Label		ns penying product		
6. Manner in Which Label	s Affixed to Product Lither Pepe	ograph or glued or ded	graph Other						
			tion - IV						
1. Contact Point Comple	te items directly below for identifica	tion of indi	vidual to be contacted	, if nec	essary, to pro	cess this	application.)		
Name Thomas Bade Ph.D.			Title Regulatory Manager 847-968-			No. (Include Aree Code) 3-4726			
l certify that the sta l ecknowledge that both under applicab	cetion nd all attec etoment m	hments thereto are tru ay be punisheble by (i	re, acc ne or i	urate and con mprisenment	accorr plota: c	6. Dete Application Received (Stamped)			
2. Signeture	3. Title	Regulatory Manager				(
4. Typed Nema Thomas 8	5. Date 3/8/12					6 4 4 6 6 4 5 6 6 6 7 6			



March 8, 2012

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Mr. Chris Pfeifer

Regulatory Action Leader

Biopesticides and Pollution Prevention Division (7511P)

U.S. Environmental Protection Agency

Subject:

Valent BioSciences Corp.

Registration of a new facility for Manufacturing of S-Abscisic Acid,

(EPA Reg.No.73049-460)

The following submission is an analysis of five (5) typical lots for the biochemical plant growth regulator S-Abscisic Acid (S-ABA, VBC-30054), EPA Reg.No.73049-460. The manufacturer has completed construction of a new manufacturing facility (EPA Establishment #81887-CHN-002) and has produced five typical lots. The manufacturing company has not changed, the manufacturing process has not changed, only the facility location in which the manufacturing occurs has changed.

Valent BioSciences has analyzed these five typical lots to insure that the new facility is producing S-Abscisic Acid at the same certified limits as currently registered.

All impurities are the same as currently certified, within the allowed limits currently certified and the mass balance is as currently presented. We are submitting this five-lot analysis and requesting the registration of this manufacturing site for the production of S-Abscisic acid.

Valent BioSciences believes this action fits the category of B680 "Label amendment requiring data submission" with a cost of \$4,631 and a PRIA timeline of 5 months.

Valent BioSciences has previously submitted payment for this registration action; [Pay.gov tracking ID: 255VVD58, Name of account: Valent BioSciences Corp. Payment amount: \$4,631.00, Payment date: March 8, 2012].



Included in this application are; -a transmittal document that lists two (2) new studies submitted in support of this submission, -three copies of each of these studies, -a new CSF for Reg # 73049-460 with the manufacturing location updated and the nominal and limits updated (one copy with the changes highlighted and one copy without highlighting), -a new CSF for Reg # 73049-461 ProTone SG with the manufacturing location updated and the nominal % for the active ingredient updated (one copy with the changes highlighted and one copy without highlighting), -a new CSF for Reg # 73049-462 ConTego Pro SL with the manufacturing location updated and the nominal % for the active ingredient updated (one copy with the changes highlighted and one copy without highlighting), and -a new CSF for Reg # 73049-474 Massivo BioNik with the manufacturing location updated and the nominal % for the active ingredient updated (one copy with the changes highlighted and one copy without highlighting).

This submission is organized as follows:

Cover letter

Administrative Documents

Transmittal Document (listing all studies submitted)

Form 8570-1 EPA Pesticide Registration Application form

Form 8570-34 Certification with Respect to Citation of Data

Copy of the Pay.gov tracking receipt, [Pay.gov tracking ID: 255VVD58]

Form 8570-35 Data Matrix (VBC-30054 [TGAI]),

Form 8570-4 CSF Reg # 73049-460 (VBC-30054 [TGAI])

Form 8570-4 CSF Reg # 73049-461 ProTone SG

Form 8570-4 CSF Reg # 73049-462 ConTego Pro SL

Label for S-Abscisic Acid (VBC-30054)

Three copies of each study submitted. The new reports included in this submission are;

Guideline	Data Requirement	VBC Report Number, issue date	
830.1700	Preliminary Analysis		Report #: VBCL12-48060-01; S-ABA 312-01 (March 8, 2012)
830.1750	Certified Limits		Report #: S-ABA 30054; 312-02 (March 8, 2012)

The reports contained within this submission pertain to analysis of production lots of the S-Abscisic acid TGAI produced at the new facility and discussion of the certified limits.

If I can be of any assistance during the review of this application please contact in at (847)-968-4726 (or at this application please contact.

Thomas Bade Ph.D.

Sincerely,

Regulatory Manager

Valent BioSciences

32

Transmittal Document

S-Abscisic Acid (S-ABA)
Technical grade Active Ingredient
EPA Registration # 73049-460

Company

Submitter:

Valent BioSciences Corp.

870 Technology Way Libertyville, IL 60048

Agent:

Thomas Bade Ph.D.

Regulatory Manager, Regulatory Affairs

847-968-4726

Regulatory Action: In support of the registration of a new manufacturing facility for

Technical Grade Active Ingredient (TGAI) S-Abscisic Acid,

Reg # 73049-460.

Transmittal Date: March 8, 2012

<u>Listing of Submitted Studies:</u>

Document 1

Title: Analysis and Certification of Product Ingredients in Selected Lots of S-Abscisic

Acid

Data requirements: OPPTS 830.1700, 830.1750

Study Date: March 8, 2012

Performing Laboratory: Valent BioSciences Corp. Research Center.

6131 Oakwood Road Long Grove, IL 60047

Project ID: VBCL12-48060-01; S-ABA 312-01

MRID No.: 48765401

Document 2

Title: S-Abscisic Acid: VBC-30054 TGAI Product Chemistry: Certification of Limits

Data requirements: OPPTS 830.1750

Study Date: March 8, 2012

Performing Laboratory: Valent BioSciences Corp.

870 Technology Way Libertyville, IL 60048

Project ID: S-ABA 30054; 312-02

MRID No.: 48765402

Company Official:

Company Name: Valent BioSciences Corporation

Signature

Company Contact: Thomas Bade Ph.D.

847-968-4726

Phone

Inert ingredient information may be entitled to confidential treatment $_{\mathrm{Page\ 1\ of\ 2}}$



RE: Inert Issues and Application Deficiency (73049-460)

Bade, Thomas

to:

Tracy Jackson

03/19/2012 09:47 AM

Cc:

"Herrero, Maria"

Hide Details

From: "Bade, Thomas" < Thomas.Bade@valentbiosciences.com>

To: Tracy Jackson/DC/USEPA/US@EPA

Cc: "Herrero, Maria" < Maria Herrero @valentbiosciences.com>

History: This message has been forwarded.

Tracy: Thank you for your direction. I will send another form (8570-34) with the correct box designated.

In the inert status form for ConTego Pro SL you listed	as having the wrong CAS number
). The should be listed as	(also call
This has the CAS Number . I will edit the Ca	SF and send a new copy. Do I send this to the front end
screen and if so what designation should I include to n	nake sure it gets to you, or directly to you?
Wen.	A STATE OF THE PROPERTY OF THE
For the Massivo BluNik Plant Growth Regulator, this is	a seed treatment end use formulation used for Hybrid
	rid seeds. It did not receive a tolerance or an exemption
for a tolerance, it is a non-food use. Does this alleviate	e the concerns regarding the non-food use status of
Th	ne name on the specification sheets for
	·

From: Tracy Jackson [mailto:Jackson.Tracy@epamail.epa.gov]

Sent: Monday, March 19, 2012 7:23 AM

To: Bade, Thomas

Subject: Inert Issues and Application Deficiency (73049-460)

Dear Mr. Bade,

I am contacting you regarding your submission of S-Abscisic Acid, Technical Grade Active Ingredient (73049-460). There were some inert issues on the Confidential Statement of Formula of the end use products and a deficiency in the application packet.

Application Deficiency:

On the Certification with Respect to Citation of Data (form 8570-34), under Section I: Method of Data Support. The box on the right should be the checked which states "I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used)."

Please see inert status forms below for inert issues.

(See attached file: Inert Status.doc)(See attached file: Inert Status form.doc)

Please send all corrections to jackson.tracy@epa.gov

If you have any questions I can reached at 703-308-7227

Thank you

Tracy Jackson Macfadden/EPA Contractor 2777 S. Crystal Drive Arlington, VA 22202



RE: Inert Issues and Application Deficiency (73049-460) Bade, Thomas

to:

Tracy Jackson 03/19/2012 10:26 AM

Hide Details

From: "Bade, Thomas" < Thomas. Bade@valentbiosciences.com>

To: Tracy Jackson/DC/USEPA/US@EPA

Inert ingredient information may be entitled to confidential treatment

History: This message has been replied to.

I will send the form and CSF by E-Mails. I have found an alternate name OptiXan Dispersible Transparent but not OptiXan Dispersible T.

From: Tracy Jackson [mailto:Jackson.Tracy@epamail.epa.gov]

Sent: Monday, March 19, 2012 9:13 AM

To: Bade, Thomas

Subject: Fw: Inert Issues and Application Deficiency (73049-460)

Hello Mr. Bade,

You can send the the revised CSF directly to me. Will you be sending it by e-mail? As for an alternate name for it also?

Thank you

Tracy Jackson
Macfadden/EPA Contractor
2777 S. Crystal Drive
Arlington, VA 22202
----- Forwarded by Tracy Jackson/OC/USEPA/US on 03/19/2012 10:08 AM -----

From: "Bade, Thomas" <Thomas.Bade@valembiosciences.com>
To: Tracy Jackson/DC/USEPA/US@EPA
Cc: "Herrero, Maria" <Maria.Herrero@valentbiosciences.com>
Date: 03/19/2012 09:47 AM
Subject: RE: Inert Issues and Application Deliciency (73049-460)

Inert ingredient information may be entitled to confidential treatment

Tracy: Thank you for your direction. I will send another form (8570-34) with the correct box designated.

In the inert status form for ConTego Pro SL you listed as having the wrong CAS number (also call should be listed as hould be listed as (also call should be listed as). This has the CAS Number (also call should be listed as screen and if so what designation should t include to make sure it gets to you, or directly to you?

For the Massivo BioNik Plant Growth Regulator, this is a seed treatment end use formulation used for Hybrid seed production. It is used on seed used to make hybrid seeds. It did not receive a tolerance or an exemption for a tolerance, it is a non-food use. Does this alleviate the concerns regarding the non-food use status of

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Sent: Monday, March 19, 2012 7:23 AM

To: Bade, Thomas

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t am contacting you regarding your submission of S-Abscisic Acid, Technical Grade Active Ingredient (73049-460). There were some inert issues on the Confidential Statement of Formula of the end use products and a deficiency in the application packet.

Application Deficiency:

On the Certification with Respect to Citation of Data (form 8570-34), under Section I: Method of Data Support. The box on the right should be the checked which states "I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used)."

Please see inert status forms below for inert issues.

(See attached file: Inert Status.doc)(See attached file: Inert Status form.doc)

Please send all corrections to jackson.tracy@epa.gov

If you have any questions I can reached at 703-308-7227

Thank you

Tracy Jackson Macfadden/EPA Contractor 2777 S. Crystal Drive Arlington, VA 22202



Inert Issues and Application Deficiency (73049-460) Tracy Jackson to: thomas.bade

03/19/2012 08:23 AM

Dear Mr. Bade,

I am contacting you regarding your submission of S-Abscisic Acid, Technical Grade Active Ingredient (73049-460). There were some inert issues on the Confidential Statement of Formula of the end use products and a deficiency in the application packet.

Application Deficiency:

On the Certification with Respect to Citation of Data (form 8570-34), under Section I: Method of Data Support. The box on the right should be the checked which states "I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used)."

Please see inert status forms below for inert issues.





Inert Status.doc Inert Status form.doc

Please send all corrections to jackson.tracy@epa.gov

If you have any questions I can reached at 703-308-7227

Thank you

Tracy Jackson Macfadden/EPA Contractor 2777 S. Crystal Drive Arlington, VA 22202



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 13, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-462249

EPA File Symbol or Registration Number: 73049-460

Product Name: S-ABSCISIC ACID, TECHNICAL GRADE ACTIVE INGREDIENT

EPA Receipt Date: 09-Mar-2012 EPA Company Number: 73049

Company Name: VALENT BIOSCIENCES CORPORATION

THOMAS BADE VALENT BIOSCIENCES CORPORATION 870 TECHNOLOGY WAY, SUITE 100 LIBERTYVILLE, IL 60048-6316

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: B680

AMENDMENT; NON-FAST TRACK; MICROBIAL/BIOCHEMICAL;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-8715.

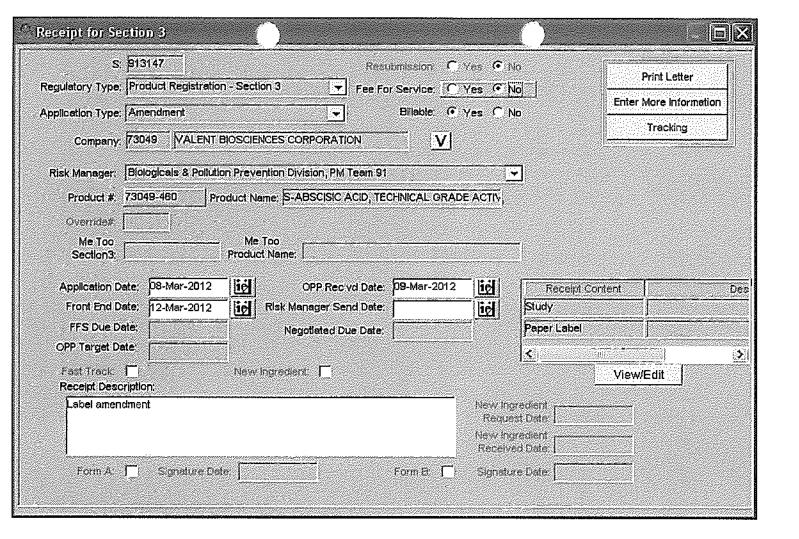
Sincerely

Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

This package includes the following	for Division	
New Registration● Amendment	○AD ◎BPPD ○RD	
Studies? □ Fee Waiver?□ volpay % Reduction:	Risk Mgr. 91	
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	913147 73049-460 3/9/2012	
This item is NOT subject to	FFS action.	
Action Code: Requested: 3640 Granted: 3640 Amount Due: \$	Parent/Child Decisions:	
Inert Cleared for Intended Use Reviewer: Andrew By ce land Remarks:	Uncleared Inert in Product Date: 3/12/12	



Commercial/financial information may be entitled to confidential treatment

Bade, Thomas

From: paygovadmin@mail.doc.twai.gov

Sent: Wednesday, March 07, 2012 11:14 AM

To: Bade, Thomas

Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you chose the option to receive payment reminders in your user profile and this is a deferred or recurring payment, you will receive a reminder email several days before the payment is processed. You may change your payment reminder preferences and email address in your user profile at any time.

If you wish to cancel this recurring payment series, log in to your account at https://www.pay.gov/ and click on the "Pending Payments List" option or contact Pay.gov Customer Service at (800) 624-1373.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 255VVD58 Agency Tracking ID: 74289493162

Account Holder Name: Valent BioSciences Corporation Transaction Type: ACH Debit

Transaction Amount: \$4,631.00 Payment Date: Mar 8, 2012 Account Type: Business Checking

Routing Number: Account Number:

Transaction Date: Mar 7, 2012 12:14:28 PM Total Payments Scheduled: 1

Frequency: OneTime

Decision Number: Registration Number:

Company Name: Valent BioSciences Corpor

Company Number: 73049

Action Code:

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

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ciece,



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

WASHINGTON	i, D.C. 20460			
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.				
Certification with Respect to C	Citation of Data			
Applicant's/Registrant's Name, Address, and Telephone Number Valent BioSciences, 870 Technology Way, Libertyville Illinois 60048		EPA Registration Number/Fite Symbol 73049-460		
Active Inoredient(s) and/or recresentative test compound(s) S- Abscisto acid (EPA Registration # 73049-460)		Date October 25, 2010		
General Use Patlem(s) (list all those claimed for this product using 40 CFR Part 158 Plant growth regulator - Technical Grade Active Ingredient)	Product Name S-Abscistc acid (S-ABA)		
NOTE: If your product is a 100% repackaging of another purchased EPA-registers submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator) (EPA Fo		or all the same uses on your tabel, you do not need to		
I am responding to a Data-Cali-In Notice, and trave included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should		
SECTION I: METHOD OF DATA SUPP	ORT (Check one m	elhod only)		
i am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation [the Oata Matrix form should be used for this purpose].	a list of companies sent offers of compensation [the Oata Matrix form 🗸 under the selective method), and have included with this form a			
SECTION II: GENERAL	OFFER TO PAY			
(Required if using the cite-atl method or when using the cite-atl option under the selection of the cite and agree to pey compensation, to other persons, with regard to				
SECTION III: CERT	IFICATION			
t certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Cali-In response, in indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application sour uses. It certify that for each exclusive use study cited in support of this registration.	addilion, if the cite- it (1) concern the pro is a type of data tha ght the initial registra	ell option or cite-all option under the selective method is operties or effects of this product or an identical or I would be required to be submitted under the data Ition of a product of identical or similar composition and		
the written permission of the original data submitter to cile that study.	or reregisuation, ur	at Lam the original data spomitter or that I have obtained		
t certify that for each study cited in support of this registration or reregistration submitter; [b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; [d] the study is in the public literature; or (e) offered (f) to pay compensation to the extent required by sections 3(c](1)(F) and/or 3(amount and terms of compensation, if any, to be paid for the use of the study.	study in support of t I have notified in we	hts application; (c) all periods of eligibility for filing the company that submitted the study and have		
accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will	I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(o)(1)(F) and/or 3(o)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.			
t certify that the statements i have made on this form and all attachm knowingly false or misteading statement may be punishable by fine or impriso				
Signalura Woman Scale	Oate / 3/19/12	Typed or Printed Name and Title Thomas Bade, Reguletory Manager		

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

March 13, 2012

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

VALENT BIOSCIENCES CORPORATION 870 TECHNOLOGY WAY, SUITE 100 LIBERTYVILLE, IL 60048-6316

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 09-MAR-12. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



Form Approved OM8 No. 2070-0060

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send the form to this address.				2327	0000
	DATA	MATRIX		60040	o 6
Date 3/8/2012			EPA Reg No./File Symbol 73049-460		Page 1 of 5
Applicant's/Registrant's Name & Address Valent BloSciences Corporation, 870 Technology Way, Livertyville, IL, 60048			Product S-Abscisic Acid (VBC-30054); TGAI for Manuf	acturing Use Only	**************************************
Ingredient S-Abscisic Acid (S-ABA)	; (S)-5-(1-hydroxy-2,6,6-trimethyl-4-oxo-2-cyclohexen-1-yt)-3-me	thyl-[2Z,4E)-pentac	tienoic acid, [CAS # 21293-29-8]		
Guideline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note
880.1100, 880.1200, 880.1400	Integrated Manufacturing Process S-ABA # 30054; 056-4	46895601	Valent BioSciences EPA # 73049	OWN	
880.1100, 880.1200, 880.1400	Integrated Manufacturing Process S-ABA #30054; 927-1	47067903	Valent BioSciences EPA # 73049	OWN	
830.1700, 830.1750, 830.1800	Product Chemistry: Analysis, Cert limits, #30054; 056-5	46895602	Valent BioSciences EPA #73049	OWN	
830.1700, 830.1750, 830.1800	Product Chemistry; Analysis, Cerl limits, #30054; 027-2	47067904	Valent BioSciences EPA (‡ 73049	OWN	
830.1700	Technical 5-Lot Analysis, PTRL # 1473W	47470401	Valent BioSciences EPA # 73049	OWN	
830.1700	VBC-30054 Product Chem; Cert Limits # 30054; 127-2	47470403	Valent BioSciences EPA # 73049	OWN	
830.1800	Anal Mtd; Validation TGAI and formulation, PTRL# 1442W	46895610	Valent BioSciences EPA #73049	OWN	
830.1700	Charaterization of 1-4 diol # VBCL07-48060-01	47470520	Valent BioSciences EPA #73049	OWN	
830.0000	30054 Phys Chem Summary, # 30054; 056-3	46895603	Valent BioSciences EPA #73049	OWN	
830.6302, 830.6303, 830.6304	30054 Phys Cehm Characteristics PRTL # 1438W	46895604	Valent BioSciences EPA # 73049	OWN	
830.6313	30054 Stability, Temp, Metals & lons PTRL # 1618W-1	47470406	Valent BioSciences EPA #73049	OWN	
830.6315	30054 Ftamability, Explodability, HLS # ZAB0083/072858	47470410	Valent 8ioSciences EPA#73049	OWN	
830.7000, 830.7300	30054 pH, PTRL# 1558W	46895607	Valent BioSciences EPA # 73049	OWN	
830.7200, 830.7300	30054 Melting Point, Density PTRL # 1438W	46895604	Valent BioSciences EPA # 73049	OWN	
830.7840, .7550, .7560, .7570	30054 water Sot, Part Coef, Diss Const, PTRL#1437W	46895605	Valent BioSciences EPA # 73049	OWN	
Signature	Tan ady		Name and Title Thomas Bada, Regutatory Manager		Date 3/8/17

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Form Approved OMB No. 2070-0060

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	DATA	A MATRIX		20204	?
Date 3/8/2012			EPA Reg No./File Symbot 73049-460		Page 2 of 5
Applicant's/Registrant's Name & Address Valent BioSciences Corporation, 870 Technology Way, Livertyville, IL, 60048			Product S-Abscisic Acid (VBC-30054); TGAI for Manufacturing Use C		nty
tngredient S-Abscisic Acid (S-AB,	A]; (S]-5-(1-hydroxy-2,6,6-trimethyl-4-oxo-2-cyclohexen-1-yl)-3-me	thyl-(2Z,4E)-pentac	lienoic acid, [CAS # 21293-29-8]		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830,000	Lomon Phys Chem Summary # 2004B-04	47470413	Vatent BioSciences EPA #73049	OWN	
830.1800	Analytical HPLC Method #VBC-M04001.2		Valent BioSciences EPA #73049	OWN	
830.7050	30054 - UV/Vis Abs, Spectra DeCode REP-RC-2004-048	47470414	Valent BioSciences EPA # 73049	OWN	
330.7050	30054 - Ref Std retest DeCode REP-RC-2005-039	47470415	Valent BioSciences EPA # 73049	OWN	
330,7950	30054 - Vapour Pressure, PTRL # 1436W-1	46895606	Valent BioSciences EPA #73049	OWN	
830.7840	30054 - Solubility in Organic Solvents, PTRL # 1730W-1	47470411	Valent BioSciences EPA # 73049	OWN	
830.2110	30054 - Hydrolysis at pH 4, 7, 9, PTRL # 1729W-1	47470412	Valent BioSciences EPA #73049	OWN	
330.6317, 830.6320	30054 -Storage Stability & Corrosion PTRL # 2048W	48674901	Valnet BioSciences EPA # 73049	OWN	
Signature	an Sade		Name and Title Thomas Bade, Regulatory Manager		Dale /8/17

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Form Approved OMB-No. 2070-0060

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		DATA MATRIX		*****	,
Date 3/8/2012			EPA Reg No./File Symbol 73049-460		Page 3 of 5
		Product S-Abscisic Acid (VBC-30054); TGAt for Manufacturing Use Only		aly	
Ingredient S-Abscisic Acid (S-AB	A); (S)-5-(1-hydroxy-2,6,6-trimethyl-4-oxo-2-cyclohexen-1-yl)	-3-methyl-(2Z,4E]-pentac	lienoic acid, (CAS # 21293-29-8]		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	30054 - Acute Oral, PSL # 16974	46895611	Valent BioSciences EPA #73049	OWN	
870.1200	30054 - Acute Dermal, PSL # 16975	46895612	Valent BioSciences EPA # 73049	OWN	
870.1300	30054 - Acute Inhalation, PSL # 17515	46895613	Valent BioSciences EPA # 73049	OWN	
870.2400	30054 - Primary Eye Irriation, PSL # 16976	46895614	Valent BioSciences EPA # 73049	OWN	
870.2500	30054 - Primary Darmal Irritation, PSL # 16977	46895615	Valent BioSciences EPA # 73049	OWN	
870.2600	30054 - Dermal Sensitization, PSL # 16978	46895616	Valent BioSciences EPA # 73049	OWN	
870.1300	30054 - Acute Inhalation, PSL # 27098		Valent BioSciences EPA # 73049	OWN	
H HIN HATELEN					
Signature	a63ale		Name and Title Thomas Bade, Regulatory Manager		Date /8/1.



Form Approved OMB₃N₀, 2070-0060

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Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Directer, OPPE Information Management Division [2137], U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20469. Do not send the form to this address.

send the form to this address.				0,000	2000
	DAT	A MATRIX	***************************************	4 1. 2 2 4	~ ~
Date 3/8/2012			EPA Reg No./File Symbol 73049-460		Page 4 of 5
Applicant's/Registrant's Name & Address Valent BioSciences Corporation, 870 Technology Way, Livertyville, IL, 6004B			Product S-Abscislc Acid (VBC-30054); TGAI for Manufacturing Use C		1/y
Ingredient S-Abscisic Acid (S-AB)	A); (S)-5-(1-hydroxy-2,6,6-trimethyl-4-oxo-2-cyclohexen-1-yl)-3-m	ethyl-(2Z,4E)-pentac	lienoic acid, [CAS # 21293-29-8)		.
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Nole
870.3100	90-Day Oral Toxicily, CRL #28084	47470510	Valent BioSciences EPA # 73049	OWN	
370.3250	21-Day Repeat Dermal, CRL #27971	47470508	Valent BioSciences EPA # 73049	OWN	
870.3700	Teratology. preliminary Prenatal Dev, CRL # 28566	47470511	Valent BioSciences EPA # 73049	OWN	
870.3700	Teralelogy, Prenatal Development, # WIL-505004	474705 f2	Valent BioSciences EPA #73049	OWN	
370.5100	Bacterial Reverse Mutation, Covance # 7194-101	47030901	Valent BioSciences EPA #73049	OWN	
870.5300	tn vitro cell gene mutation, Covanca # 7194~103	47005301	Valent BioSciences EPA # 73049	OWN	
870.5375	tn vitro cell gene mutation, Covance # 7194-102	47005302	Valent BioSciences EPA # 73049	OWN	
370.3050	4-week Oral Toxicity, CRL # 27720	47470509	Valent BioSciences EPA # 73049	OWN	
370.3100	13-Week Oral Toxicity, CRL # 28084	47470510	Valent BioSciences EPA # 73049	OWN	
N/A	Endocrine Disruptor Testing, #VBC-SCC ABA f2-14-07	47470513	Valent BioSciences EPA #73049	OWN	
3 10101010101					
Signature	Dade		Name and Title Thomas Bade, Regulatory Manager		Date /8/12



Form Approved OMB: Not: 2070-0060

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	DATA	A MATRIX		00000	* * * * * * * * * * * * * * * * * * *	
Date 3/8/2012			EPA Reg No./File Symbol 73049-460		Page 5 of 5	
Applicant's/Registrant's Name & Address Vatent BioSciences Corporation, 870 Technology Way, Livertyville, IL, 60048			Product S-Abscisic Acid (VBC-30054); TGAI for Manufacturing Use O		2 23	
Ingredient S-Abscisic Acid (S-ABA	A); (S)-5-(1-hydroxy-2,6,6-trimethyl-4-oxo-2-cyclohexen-1-yl)-3-me	thyl-(2Z,4E)-pentac	lienoic acid, CAS # 21293-29-8)			
Guideline Reference Number	Guldeline Study Name	MRID Number	Submitter	Status	Note	
850.2100	Acute Avian - 30054, Wt # 529-111	47067901	Valent BioSciences EPA # 73049	OWN		
850.2200	Avian Dietary tox, Waiver S-ABA 30054: 058-f	47470521	Valent BioSciences EPA # 73049	OWN		
850.1075	Acute Fish - 30054, WI # 529A-104	47131402	Valent BioSciences EPA #73049	OWN		
850.1010	Acute invertebrate, fresh water - 30054, Wt # 529A-103	47131401	Valent BioSciences EPA # 73049	OWN		
850.4100, 850.4150	Non-target plant lexicity, S-ABA 30054;047-02	47 f31404	Valenf BioSciences EPA # 73049	OWN		
850.4100, 850.4150	Non-target plant toxicity, S-ABA 30054;047-02REF	47153201	Valent BioSciences EPA # 73049	OWN		
850.4350	Non-target tnsect-honeybee, EuGAB#20071029/S1BLEU	47151201	Valenf BioSciences EPA # 73049	OWN		
N/A	EarthWorm Toxicity. WI # 529-119	47470514	Valent BioSciences EPA # 73049	OWN		
850.0000	Lomon Summary of EcoTox Results, #June 2000	47470515	Valent BioSciences EPA # 73049	OWN		
850.0000	Background Review of Literature, #ABA-LS2	474705 f8	Valent BioSciences EPA #73049	OWN		
850.0000	Copies of background titerture papers, # ABA-LS2 REF	47470519	Valent BioSciences EPA #73049	OWN		
860.1500	Residue Analytical method, # S-ABA 30054; 106-1	46985604	Valent BioSciences EPA # 73049	OWN		
B50. f500	Fate in Grapes, resdiue Levels, #S-ABA 30025; 086-f	47005303	Valent BioSciences EPA # 73049	OWN		
860. f360	Multiresidue method testing Waiver, S-ABA 30054; 058-2	47470522	Valent BioSciences EPA # 73049	OWN		
Signature	Bade	***************************************	Name and Title Thomas Bade, Regulatory Manager		Date /8/12	

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Agency Infernat Use Copy

Memorandum

Date:	03/15/10
To:	्रित्र , Regulatory Manager
From:	Information Services Branch, ITRMD
indicati	our receipt of this data submission is not an on that MRIDs for the enclosed studies have sted to OPPIN.
from th	e expect that it will be approximately 5 days ne above date before the study-level data is le in OPPIN.
_	you have any questions about this process, contact Teresa Downs (305-5363).
This is	a: fully accepted submission partially accepted submission rejected submission

S-Abscisic Acid, Technical Grade Active Ingredient (S-ABA, VBC-30054)

FOR FORMULATION INTO PLANT GROWTH REGULATOR (PGR) PRODUCTS

FOR MANUFACTURING OR FORMULATION USE ONLY

Active Ingredient	
S-Abscisic Acid	97.9% w/w
Other Ingredients	
Total	100.0% w/w

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
If in Eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
	HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call toll-free 1-800-892-0099 (24 hours) for emergency medical treatment and/or transport emergency information. For all other information, call 1-847-968-4700.

EPA Registration No. 73049-460 EPA Establishment No.

Valent BioSciences Corporation 870 Technology Way Libertyville, IL 60048 1-847-968-4700

Net Content: 25 kg, 50 kg

Page I of 3 52



HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Mixers, loaders and handlers must wear the appropriate personal protective equipment (PPE): long sleeved shirt and pants, shoes and sock, and protective eyewear. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination Systems (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment wash-waters or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

S-Abscisic Acid is intended for use in the formulation of Plant Growth Regulator (PGR) products, to be applied to field and container-grown plants to induce and regulate PGR responses.

This product may be used to formulate products for any additional uses not listed on the MP label if the formulator has complied with U.S. EPA data submission requirements regarding the support of such uses. Products made from this technical material will require registration with the U.S. Environmental Protection Agency (EPA).

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STORAGE AND DISPOSAL

Dô faot contaminate water, food or feed by storage or disposal.

*Pestito de Storage: Keep container tightly closed when not in use. Store product in a cool and dry place. Avoid extended storage conditions at temperatures above 25°C (77°F).

<u>Pesticide Disposal:</u> To avoid wastes, use all material in this container according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry). Do not contaminate water when disposing of equipment wash-water or rinsate. Improper disposal of unused pesticide, wash-water or rinsate is a violation of federal law.

Container Disposal: Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Completely empty drum liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Fill ¼ full with water. Shake for 10 seconds. Pour rinsate into manufacturing equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

Non-refillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Completely empty drum contents into manufacturing equipment or a mix tank by shaking and tapping sides and bottom to loosen clinging particles. Fill container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

Warranty and Disclaimer Statement:

To the fullest extent permitted by law, seller makes no warranty, express or implied, of merchantability, fitness or otherwise concerning use of this product other than as indicated on the label. User assumes all risks of use, storage or handling not in strict accordance with accompanying directions.

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